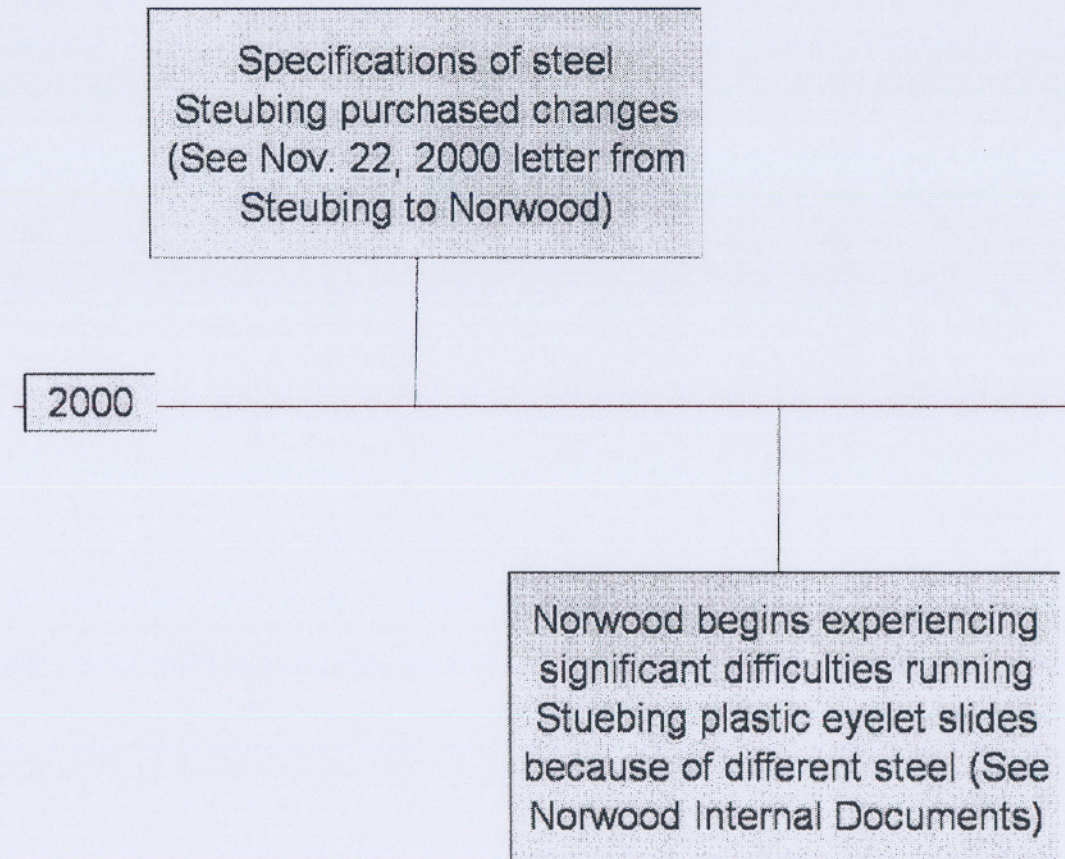


In the Matter of Metal Calendar
Slides from Japan
Before the U.S. International
Trade Commission
Inv. No. 731-TA-1094 (Final)

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

2000



Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

**Norwood documents the problems with
Stuebing's plastic eyelet slides. Exhibit
5B of Norwood's Confidential
Prehearing Brief**



Source: Norwood Public
Prehearing Brief at Exhibit
21-E.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.



Phone: (513) 771-8028
Fax: (513) 771-1573

10600 Chester Rd., Cincinnati, Ohio 45215-1206

November 22, 2000

Norwood Promotional Products, Inc.
1000 Highway 4 South
P. O. Box 8000
Sleepy Eye, MN 56085-0008

Attn: Ronald P. Anderson

Dear Ron,

I want to thank you for the opportunity to visit your facility and meet with the people in the lining department. Seeing and reviewing operating conditions with the actual people using our products gives us invaluable information towards bettering our products. I wanted to give you an update of our efforts to reduce your operating problems with our calendar slides.

We are first correcting and changing quality issues under our control that have a direct impact on our slides. We have reviewed the samples we obtained with all of our operators and have re-emphasized the principle that they are the final inspectors for quality before it ships to the customer. They are all now keenly aware of the problems you encounter even with slight irregularities in our product. Production machine settings, adjustments and machine wear issues are being addressed with the goal of improving final quality.

Some of the problems with bowed slides are more related to our raw materials and will be investigated with our suppliers. Some problems may be attributed to coil set in the steel, steel grain, steel temper, steel weight, and supplier variability in the steel.

We feel that some of the eyelid bending problems can still be attributed to the packing, settling and shipping of the slides in their individual corrugated boxes. We will work with our corrugated box supplier to see if there is a better way to pack and ship our products and still meet your weight requirement on each box.

As we mentioned, when we were at the plant, we believe that your storage and handling of the slides can be improved. We do not allow the slides to be "double stacked" or

November 22, 2000 Letter from Stuebing
To Norwood
Attn: Ronald P. Anderson

Some of the problems with bowed slides are more related to our raw materials and will be investigated with our suppliers. Some problems may be attributed to coil set in the steel, steel grain, steel temper, steel weight, and supplier variability in the steel.

They {Stuebing's operators} are all now keenly aware of the problems you encounter even with slight irregularities in our product.

As we mentioned, when we were at the plant, we believe that your storage and handling of the slides can be improved.

Jul 24 '95 15:32

SEP 1996 0336

PG02.00

Source: Nishiyama Public
Prehearing Br. at Exhibit 5.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Wald P. Anderson
Anderson Promotional Products, Inc.
November 22, 2000

Page 2

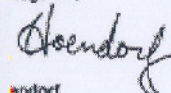
November 22, 2000 Letter from Stuebing To Norwood

calendar boxes to be stacked higher than 2'6" or seven rows high here in our plant. We have found that the lower layers of corrugated boxes get crushed from the weight and cause calendar slide damage. I know floor space is at a premium in your facility, so perhaps your storage procedures could be improved in the future.

We recognize that you are experiencing more production difficulties than in the past, but for the approximately 10 million calendar slides we supply, the actual problematic slide remains quite low (perhaps 1% or less). We do understand the frustration caused by even this percentage of spoils, and our aim is to make every slide perfect. We are working towards that goal, and until that is achieved your patience in dealing with daily issues is appreciated.

Again, it was a pleasure meeting everyone at the Sleepy Eye facility, and should you need any assistance, as usual, feel free to call anyone here at Stuebing.

Respectfully,



Wald P. Anderson
President

May Blumberg
Hoffman
Vice President

We recognize that you are
— experiencing more production difficulties than in the past, but for the approximately 10 million calendar slides we supply, the actual problematic percentage remains quite low (perhaps 1% or less). We do understand the frustration that is caused by even this percentage of spoils

4132

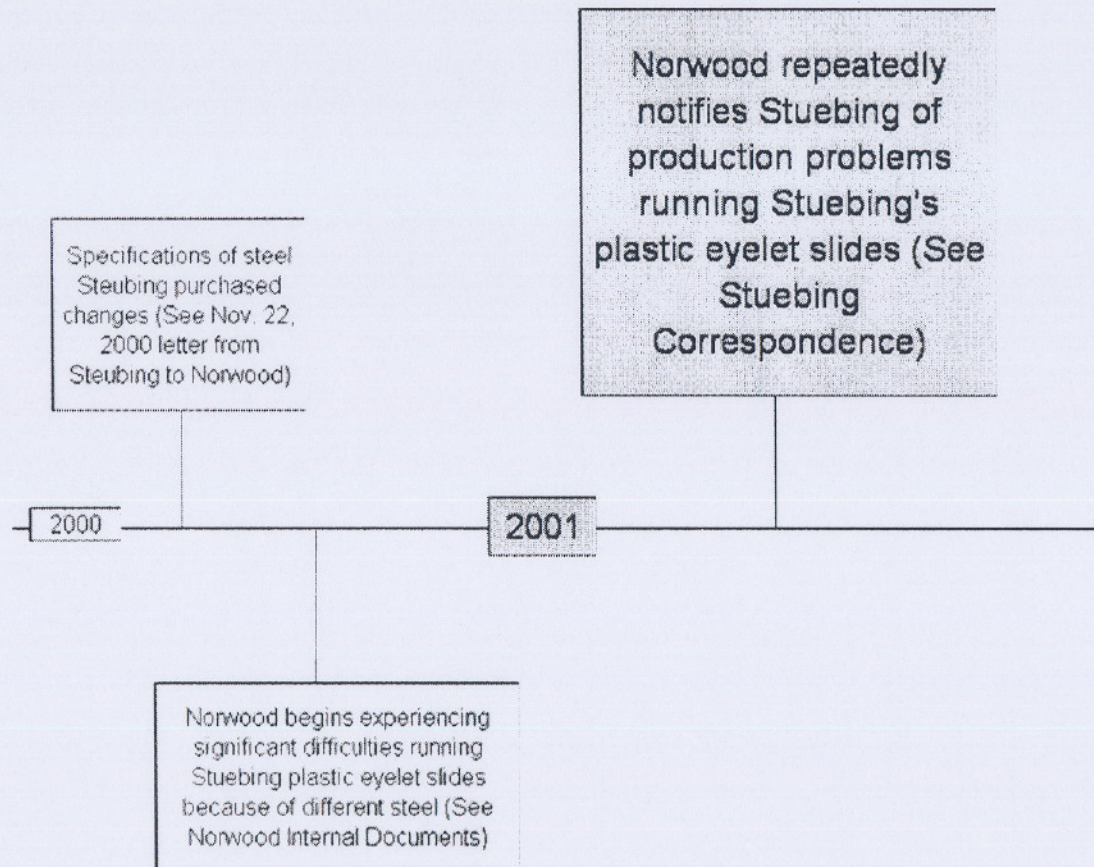
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PRR-09

Nishiyama Public
Engineering Br. at Exhibit 5.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd.Co.

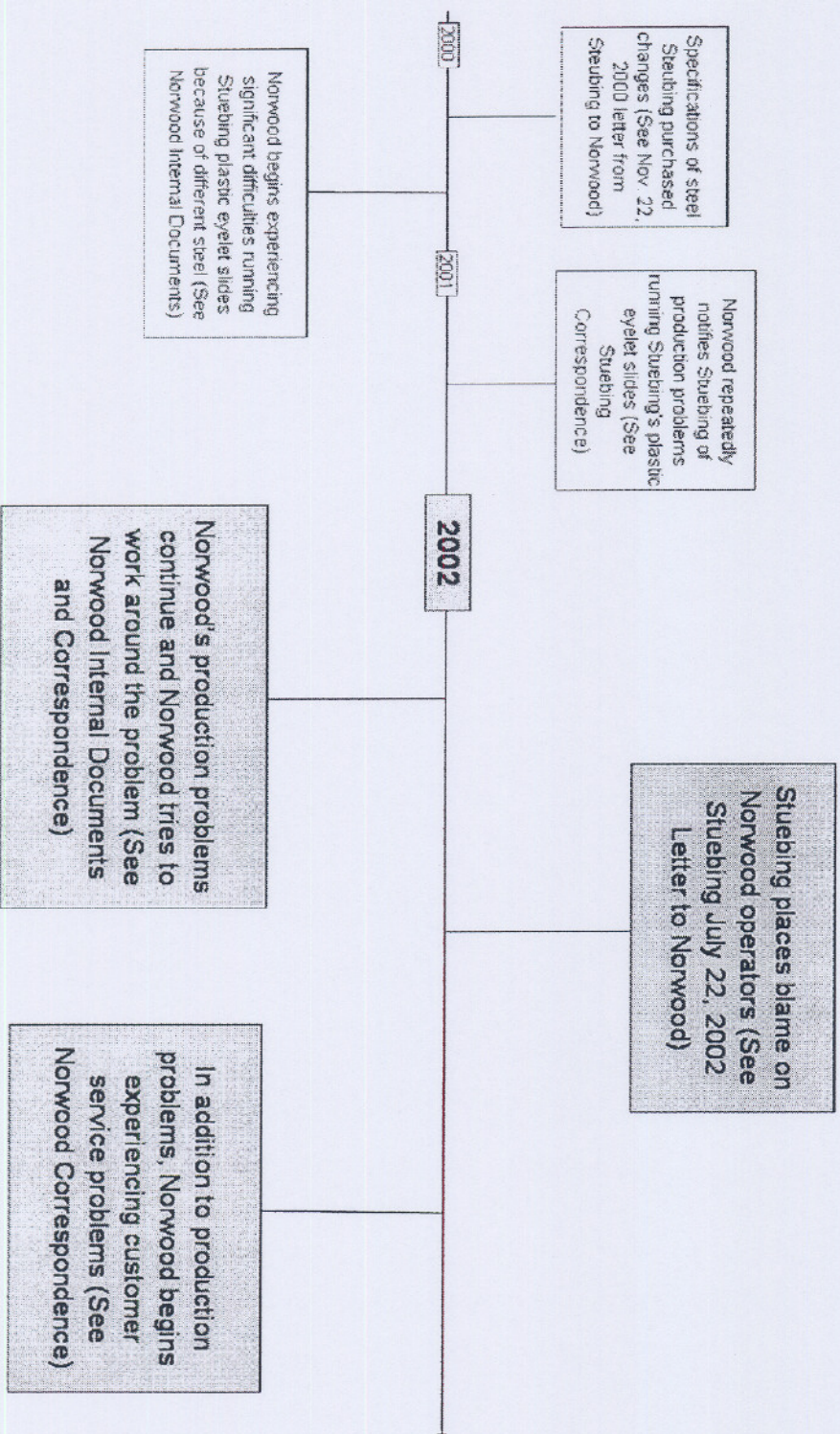
2001



Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

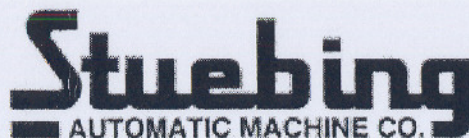
- Norwood's problems with Stuebing's slides continue. See Exhibit 5-B of Norwood's Confidential Prehearing Brief.

2002



- Norwood continues to experience and document problems with Stuebing's plastic eyelet slides. See Exhibit 6 of Norwood's Confidential Prehearing Brief.

- Stuebing responds to the ongoing Norwood complaints - about quality problems Stuebing already has acknowledged - by threatening to charge for service calls.



Phone (513) 771-8028
Fax (513) 771-1072

10800 Chester Rd., Cincinnati, Ohio 45215-1208

July 22, 2002

PLEASE CIRCULATE

Norwood Promotional Products, Inc.
1000 Highway 4 South
P.O. Box 8000
Sleepy Eye, MN 56085-0008

Attn: Shelley Shoen

Dear Ms. Shoen:

Due to fluctuating thickness and temper of available material, we strongly suggest the following guidelines when ordering the tins for the Stuebing built tinning machines (EL, ELF, ACF, and Calumatic):

Single sheet	→	5/8" tin
Multi-sheet up to .030"	→	5/8" tin
Multi-sheet up to .040"	→	3/4" tin
Multi-sheet up to .060"	→	7/8" tin

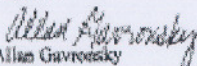
We have been on numerous service calls recently, where we have found machines out of adjustment or the paper specs exceeding our recommended guidelines. If this is the case, there will be a separate charge for any and all travel expenses plus a fee of \$150.00 per hour for our technician.

Please feel free to contact us if you are experiencing problems and we will try to assist you via the telephone. If this does not correct the problem, we can make arrangements for a service call. However, we highly recommend that you send your equipment in for our evaluation program.

We are offering a \$75.00 (plus any freight charges) evaluation fee on your EL or ELF machines, or \$375.00 (plus any freight charges) evaluation fee on your ACF or Calumatic. Recommendations to bring your machine to "Slide/Tin Ready" condition will be made and accurate quotes and repairs can be performed at our location, thus saving the expense of our technician making a service call or parts being unnecessarily replaced. If repair is required the evaluation fee will be waived.

If you have any questions, please do not hesitate to phone us.

Regards,


Allan Gavronsky
President

Stuebing July 22, 2002 Letter to Norwood

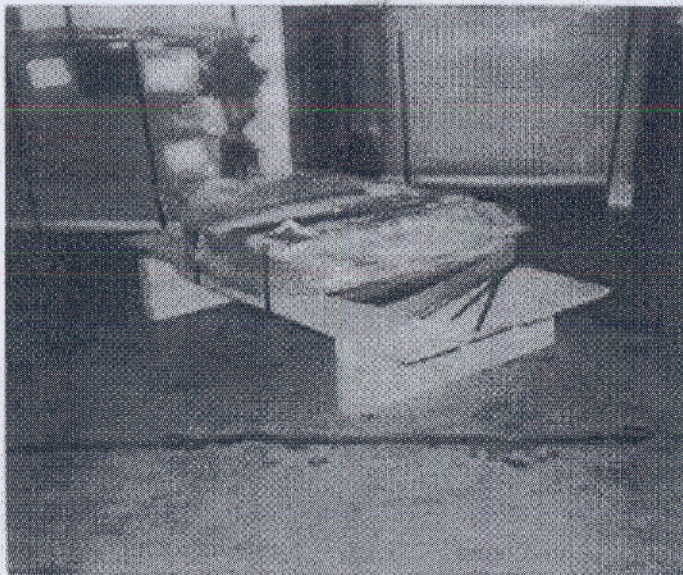
We have been on numerous service calls recently, where we have found machines out of adjustment or the paper specs exceeding our recommended guidelines. If this is the case, there will be a separate charge for any and all travel expenses plus a fee of \$150.00 per our for our technicians.

Source: Nishiyama Public
Prehearing Br. at Exhibit 9.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Norwood experiences other customer service issues.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.



1 Picture TAKEN

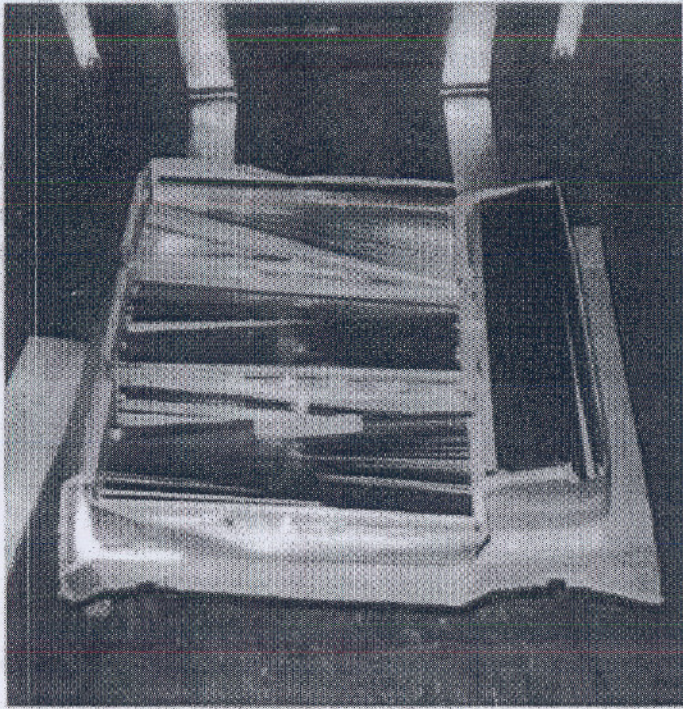


9/5/02



Source: Norwood Public
Postconference Br. at Exhibit 5.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

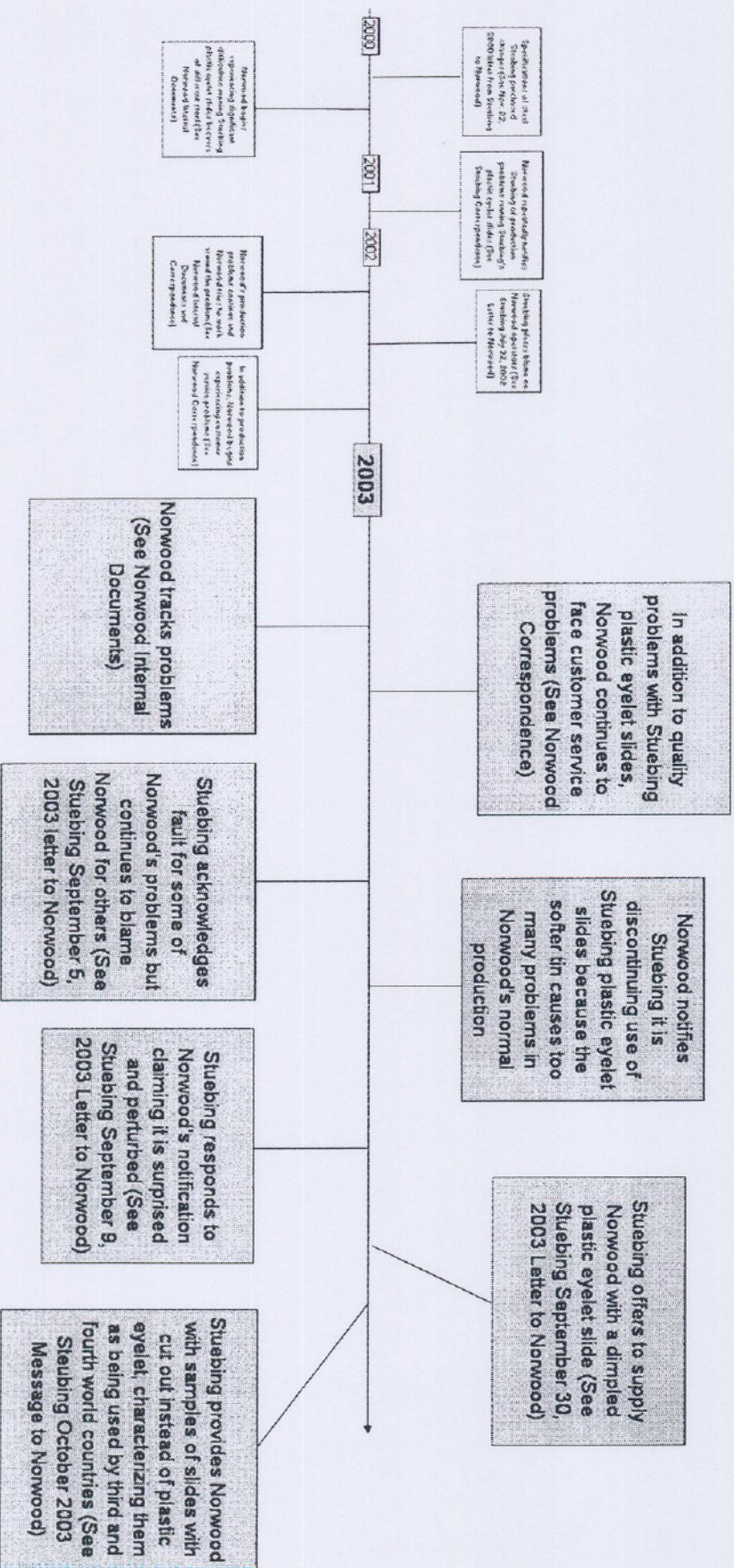


Skid broken
1 of 2

Source: Norwood Public
Postconference Br. at Exhibit 5.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

2003



Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

- Norwood's problems with Stuebing's plastic eyelet slides deepen, prompting numerous complaints. See Exhibits 9, 10 of Norwood's Confidential Prehearing Brief.

- Stuebing takes responsibility for some of Norwood's problems, but places blame on Norwood for many others.

Stuebing September 5, 2003 Letter to Norwood



Phone (513) 771-8028
Fax (513) 771-1072

10600 Chester Rd., Cincinnati, Ohio 45215-1208

September 5, 2003

Addressing Norwood Promotional Products Concerns:

Soft tin:

As the U.S. mills no longer roll 55 lb., TFS (tin Free Steel) T2-T3, the range varies from 55lb. to 70lb. DR (double reduced) BA. This allows for the use of an acceptable range and not to a specific material, which would hold us all at the mercy of mills.

Thin tin:

As explained, the tin thickness is variable and is based on supply. This material varies from .0059" to .009". The range of the material usually available is from 55# to 70# in the DR BA range. If heavier material is used, (.009) we compensate by using a softer material.

The new cam calaminics have been designed to work well with the above range of material thickness.

Eyelets Curling:

Our fault, but we have recently made machine changes to eliminate this problem. This could also result from packing too tightly.

Dimples:

All eyelets slides are dimpled on the face, alongside each eyelet. The small leg has dimples near the ends. One or two slides out of 45 slides will not have dimples as this represents the beginning of each new sheet. This is not a problem, as each slide before and after the slide will have dimples, which will properly separate all slides.

Packing slips:

Each skid will have 2 packing slips.

Inventory:

As discussed at the meeting, Stuebing will make sure that there is an overage in each run, and Norwood is to make an accounting decision on how to charge overage. There should never be a shortage on a run.

Embedded Tin:

We will make dimples more pronounced and we will pack boxes looser. However, hoppers on your tinning machine should not be overloaded, as the weight of the stack of slides causes those lower down to become embedded.

Soft tin: As the U.S. mills no longer roll 55 lb., TFS (tin Free Steel) T2-T3, the range varies from 55lb. To 70lb. DR (double reduced) BA.

Thin Tin

Eyelets Curling: Our fault, but we have recently made machine changes to eliminate this problem.

Dimples: All eyelets slides are dimpled on the face, alongside each eyelet. The small leg has dimples near the ends. One or two slides out of 45 slides will not have dimples as this represents the beginning of each new sheet. This is not a problem, as each slide before and after the slide will have dimples, which will probably separate all slides.

Inventory: There should never be a shortage on a run.

Embedded Tin: We will make dimples more pronounced and we will pack boxes looser. However, hoppers on your tinning machine should not be overloaded, as the weight of the stack of slides causes those lower down to become embedded.

Stuebing September 5, 2003 Letter to Norwood

09/05/2003 09:00

Addressing Norwood Promotional Products Concerns

Short of Blanket Order

As previously discussed, we did not want another 2001 season. Space is limited and we have needed storage space, as we are very busy from July onwards to the end of the year. To secure the best price for Norwood, we need the requirements early so that we can purchase the materials to best advantage. Most importantly, we need Blanket orders to be placed so that we can run them ahead of time, to be able to deliver on time, during the busy season.

Radius

As explained, a radius of greater than 45° and less than 42° would cause picking problems and we can't guarantee our product will work adequately outside these specs.

Twisted/Warped tin

Sometimes the grain direction of the steel causes a warping bow or twist in the slide. We are currently working on modifications to our machines to correct this.

Label on Boxes

Operators names will vary as they are rotated from machine to machine. Operator name will be put on tags, as per your request (instead of on the box, as is done currently).

Grain

The grain direction is determined by the coil size, which is available to us at the time from the steel supplier. For example, if the slide size were greater than the coil width, then this would cause the grain to run one way. However, if the slide size is less than the coil width, the grain could run the other way. The ultimate is that the grain should not cross grain to the length of the slide.

Communication

We accept fault as far as not getting back in a timely manner in regard to your letter of June 5, 2003. I am to be alerted of any correspondence and we will follow up by phone and in writing. Norwood is required to communicate problems as clearly and specifically as possible.

A new employee, R. Reier, apparently received and signed for the package and failed to pass it on. We apologize for this and I have issued instructions for all correspondence to be given to me (A. Chevrinsky), to which I will respond directly.

Radius: As explained, a radius of greater than 45° and less than 42° would cause picking problems and we can't guarantee our product will work adequately outside these specs.

Twisted/Warped tin: Sometimes the grain direction of the steel causes a warping bow or twist in the slide. We are currently working on modifications to our machines to correct this.

Grain: The grain direction is determined by the coil size, which is available to us at the time from the steel supplier.

Communication: We accept fault as far as not getting back in a timely manner in regard to your letter of June 5, 2003.

Source: Nishiyama Public
Prehearing Br. at Exhibit 11.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Norwood's notification to Stuebing that it will discontinue using Stuebing for its normal production contains no mention of price – unacceptable product quality and production rates are the only factors mentioned.

Norwood Undated September 2003 Letter to Stuebing

10/1/2003 10:10:00

7711046

NORWOOD

Allan Garavito
Stuebing Automatic Machine Co.
10400 Chester Road
Cincinnati, OH 45215

Norwood Professional
Services, Inc.

5000 Highway 4 South
Bloomington, MN 55425-1045
612.754.8000
612.754.8100 Fax
www.norwood.com

Dear Allan:

As you know, since early 2003, we have been working together to make your tin product compatible with our machines. You told us that you had switched to a softer tin. The softer tin does not work as well on our machines as your previous tin causing significantly reduced production rates.

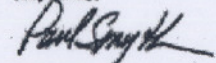
Both parties have communicated frequently regarding this problem, and you visited our manufacturing plant. We feel that all options have been exhausted and yet our production rates continue to be unacceptable. Nevertheless, we are still open to suggestions, if you have any.

As a result of the numerous delays and jams caused by the softer tin, we cannot continue to use your tin product for our normal production runs. We would like to coordinate using your tin product for our custom orders.

We have enjoyed our business relationship, and we would like it to continue.

I expect additional dialogue from you moving forward in this matter.

Respectfully,



Paul Smyth
Director of Supply Chain Management

The Norwood Group • America • Europe • Asia • Africa • Oceania • Middle East
Norwood Group • 1000 • 1000 • 1000 • 1000 • 1000 • 1000 • 1000 • 1000
Norwood Group • 1000 • 1000 • 1000 • 1000 • 1000 • 1000 • 1000 • 1000

You told us that you had switched to a softer tin. The softer tin does not work as well on our machines as your previous tin causing significantly reduced production rates.

We feel that all options have been exhausted and yet our production rates continue to be unacceptable.

As a result of the numerous delays and jams caused by the softer tin, we cannot continue to use your tin product for our normal production runs.

- Stuebing replies to Norwood's letter indicating that it is dumbfounded and perturbed. Stuebing places much of the blame on Norwood.

Stuebing September 9, 2003 Letter to Norwood

Hard Copy of Fax Sent

Stuebing
AUTOMATIC MACHINE CO.

Phone (513) 771-8028
Fax (513) 771-1072

10600 Chester Rd., Cincinnati, Ohio 45215-1208

9 September 2003

Norwood

Attention: Mr. Paul Smythe

Dear Paul,

I now reply to your (undated) letter which we received on 9/02/03, with surprise, to say the least.

This was your first ever communication to us, and the purpose of your letter was to advise us that you will in the future, effectively not be using our calendar slides.

As you are aware, the many millions of calendars which your company, and its predecessors have been tinning literally for generations, have been tinned with Stuebing slides, and using Stuebing tinning equipment.

We appreciate and value your business, which is important to us. We also take pride in the fact that our products have in some small way contributed to the business success and the growth which your company had enjoyed.

We are also proud of the quality of the products we produce and the service we have provided since 1894.

Our business, is in addition built on relationships with our customers and our suppliers. The reason for our surprise in receiving your letter is that other than 2 complaints relating to relatively small quantities of slides recently, there was no indication from your company of any problem with materials supplied, deliveries or of any dissatisfaction towards us. Then, "out of the blue" - a letter from you, (whom we have never spoken to or met previously), advising us effectively that you are "dropping" us as a supplier!

I have discussed the matter extensively with our owner, Murray Blumberg who is in town for a short time. He is equally dumbfounded and perturbed by your letter.

On receipt of your letter I immediately made arrangements to visit your plant, which I did together with Bill Pierman, our senior technician.

As to the actual complaints and problems raised at our visit to your plant and in your letter, these are dealt with in detail in Bill Pierman's attached report. I also attach a sheet with answers to the questionnaire you gave us at our plant visit.

I now reply to your (undated) letter which we received on 9/02/03, with surprise, to say the least.

The reason for our surprise in receiving your letter is that other than 2 complaints relating to relatively small quantities of slides recently, there was no indication from your company of any problem with materials supplied, deliveries or of any dissatisfaction towards us. Then, "out of the blue" - a letter from you (whom we have never spoken to or met previously), advising us effectively that you are "dropping" us as a supplier!

I have discussed the matter with our owner, Murray Blumberg who is in town for a short time. He is equally dumbfounded and perturbed by your letter.

Source: Nishiyama Public
Prehearing Br. at Exhibit 14.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing September 5, 2003 Letter to Norwood

-2-

I will therefore confine myself in the body of this letter, to a broad overview of what appeared to us to be the main causes for the problems you are experiencing, and more importantly, in an attempt to help you find solutions.

We do agree that the production rates you mentioned (± 12 calendars per minute) is unacceptable.

We have tried to identify the real reasons for your low efficiency.

1. "Poor Quality Slides?"

In my experience in ± 20 years of hands on manufacture of slides and dealing with tinning departments at customers (first at Wobbe, and more recently at Stuebing), my observation is that when a problem occurs with tinning, the immediate reaction is to blame the slides. Sometimes problems do occur with our slides, and when this happens we replace faulty slides at our expense. However, more often than not, the cause of the problem is not the slides.

1.1 Curling Eyelets

There was a problem with a relatively small quantity of slides supplied to you with eyelets curling. We apologized for these and those slides were replaced. As you should know by now, we stand by our product and we will always replace products that are faulty. We must point out that we guarantee our equipment, when used with our slides and we cannot be responsible in any way for results if other slides are used on our tinning machines.

1.2 The second complaint "Siemens Calendar" reported to us on 8/3/03 was that the slides on this calendar were not closing properly and it was reported by your people that the cause of this problem was the metal on the slides being too soft.

On receipt of the sample calendar you sent us we observed that the calendar was a multi sheet calendar with a thickness of .052". A 3/4" tin had been used to tin this calendar. This was despite the fact that we have previously repeatedly advised your people that a calendar of this thickness requires a 7/8" tin - see our circular letter to Norwood dated 7/22/02, a copy of which is attached.

Also see copy of a standard notice which appears on the foot of all of our order confirmations which have been sent to your company regularly.

We brought 7/8" slides with us to your plant and ran ± 500 of the same size calendars without any problems or stoppage.

This was a repeat of a similar problem last year when 3/4" slides were used instead of 7/8" slides. When 7/8" slides were used at a plant visit by us on these calendars a good result was again obtained.

2. Use of light gauge/soft material (metal specification)

At our plant visit and in your letter the complaint was made that the metal we were using is too soft.

We do agree that the production rates you mentioned (± 12 calendars per minute) is unacceptable. We have tried to identify the real reasons for your low efficiency.

More often than not, the cause of the problem is not the slides.

There was a problem with a relatively small quantity of slides supplied to you with eyelets curling.

This was despite the fact that we have previously repeatedly advised your people that a calendar of this thickness requires a 7/8" tin...

Stuebing September 5, 2003 Letter to Norwood

-3-

Once again, with respect this indicates a lack of understanding on the part of people responsible for tinning at Norwood.

Over the years, the ideal specification for metal for calendar slides evolved as 55# material with a soft temper. The reasons for this include the fact that the lighter, softer material causes minimum wear on the tinning machines and provides the best results. This was the standard, preferred specification for decades.

Unfortunately, as you are aware, the recent trend has been for Steel Mills worldwide to move towards rolling heavier gauges of metal and it has become increasingly difficult to source the lighter gauge material.

Last year, your company complained when finishing up slides from the previous year, that the metal was too hard and too heavy.

We in fact went to a great deal of trouble to source and allocate only the preferred lighter gauge material to Norwood.

Imagine our surprise therefore when we now receive the complaint that the material was too soft.

On reflection, probably what had happened, is that your people had become used to the heavier material over the last 3 years and they now prefer this. Another possible reason for this preference may be due to wear on some critical parts of your machines, which, ironically gives you a better result with the heavier slides.

If you want heavier material, there is certainly no problem in our obtaining that for you as it is more readily available than the lighter material. We ask only that you specify your preferences of material and we will endeavour to source this provided that we can do so:

- (a) within acceptable ranges and
- (b) that you undertake to use the material that we purchase on your request.

One disadvantage with the heavier steel gauge is of course yield. This can however be addressed through a percentage differential in the pricing.

3. The condition of your tinning equipment

As you will see from the attached report, and as we mentioned at our meeting last week, there is some significant wear on certain critical parts of your ACF's (some of which are now close to 20 years old) and this can effect your production (for example more than 1 slide dropping at a time or slides not dropping). We therefore recommended that you consider replacing these machines with newer generation equipment (see paragraph 4 below).

4. New Generation Equipment

We also advised you that, following the change in availability of material that is readily obtainable, to heavier gauges of metal, we recently developed a new generation of

Once again, with respect this indicates a lack of understanding on the part of people responsible for tinning at Norwood.

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On reflection, probably what had happened, is that your people had become used to the heavier material over the last 3 years and they now prefer this.

As you will see from the attached report, and as we mentioned at our meeting last week, there is some significant wear on certain critical parts of your ACF's.

We also advised you that, following the change in availability of material that is readily obtainable, to heavier gauges of metal, we recently developed a new generation...

Stuebing September 5, 2003 Letter to Norwood

-4-

Cam-operated Calamatic machines, which are intended to replace the air-operated machines.

We are having good results with the new machines using our slides and we recommend that you replace your air-operated machines as well as your older ACF machines with these.

5. Operator Efficiency and production speed

This is a point directly dependant on the condition of the machines, and the efficiency of adjusting and set ups to machines when required.

Following our visit we contacted a number of our customers and requested them to advise us what production speeds/rates they were obtaining.

Typical results were:

17" or 18" by 28" approximately 1000/hr. Wider, longer calendars are all variables that can slow production down.

6. Lack of dedicated/qualified set up people

We observed that your operators themselves are making adjustments/set ups on the machines -- see attached report.

This is undoubtedly one of the main reasons for your unsatisfactory production figures.

These people are not trained or qualified to do this work. Also what happens when there is a new operator, or when temporary help is used?

We strongly recommend that a qualified set up person's be trained to set and adjust these machines, and that this function should only be carried out by such a person.

It would also help to have a properly qualified person communicate problems to us so that we can assist in identifying the cause and recommend an appropriate solution.

This recommendation will go a long way to improving your productivity. It will also assist by having a qualified person, regularly working with the machines to recognise when parts are worn, or require replacement.

7. Blanket Orders

We have picked up some apparent dissatisfaction from yourselves in regard to placing blanket orders.

Once again this requires an understanding of the reasons why this has been done for so many years to your and our advantage:

As you know, the calendar business is a highly seasonal one, resulting in a peak in the latter part of the year.

These people are not trained or qualified to do this work. Also what happens when there is a new operator, or when temporary help is used?

We have picked up some apparent dissatisfaction from yourselves in regard to placing blanket orders.

Stuebing September 5, 2003 Letter to Norwood

-5-

Accordingly, when large quantities of slides are required by a company such as yours, blanket orders are placed early in the year, so that we can source the material, and run the orders in the quiet time of the year, in order to build up an inventory for you, and deliver the slides to you, according to a pre-determined schedule on time.

We supply slides to your group at substantially discounted prices, based on:

1. your volumes and
2. the fact that you place blanket orders which we can run in the quiet time of the year.

Far from being a disadvantage to you, this results effectively, in our buying material, manufacturing, and holding inventory for you, at our cost, until you need the product.

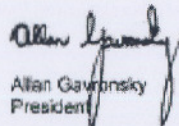
In this regard we point out that if you do decide to continue purchasing your slides from us, which we sincerely hope that you will do, it really is essential to work on a blanket order system, in order to avoid a repetition of the fiasco which occurred in 2001, when your ordering was left late, and we had to work overtime and additional shifts to try and deliver your slides to you in the peak period. We cannot be held responsible for extended deliveries, if ordering is left late.

We hope that our visit, this letter and the attached report and answers to your questionnaire will be helpful to you in solving some of the problems you have been experiencing, and improving your efficiencies.

We remain committed to assisting you to achieve these goals. Please let us know whether there is anything additional that we can do, to be of assistance.

Finally, we ask you please to advise us your intentions as far as slides are concerned, so that we can plan ahead in terms of sourcing material (or not) and personnel and production planning in general.

We look forward to receiving your reply.


Allan Gavronsky
President

cc: Mr. Murray Blumberg

It really is essential to work on a blanket order system, in order to avoid a repetition of the fiasco which occurred in 2001.

Source: Nishiyama Public
Prehearing Br. at Exhibit 14.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

- All Stuebing offers as a solution is for Norwood to recondition or replace all of its machines.

Stuebing Report on September 3&4, 2003 Plant Visit to Norwood

Report of Bill Pierman's visit to Norwood, Sleepy Eye, MN, September 3 & 4, 2003

1. 3 x 32" Calamatics:

I ran 1 machine to test slides that we were told were bad. The slides I ran were 18" x 3/4" and 22" x 5/8", both sizes ran well. I also observed Norwood operators run the other 2 calamatics, on and off, over a period of approximately 3 hours +, with little or no troubles.

2. 4 x 24" ACF Machines:

Machine #1 was set to run multi-sheet calendars with 18" x 3/4" slides.
Machine #2 was set to run multi-sheet calendars with 17" x 3/4" slides.

We started with machine #1, which ran slides supplied in November 2002, with no problems. Subsequently, tins made with 484 material were used - the Norwood people said that these would not run. Basically, these ran with little or no problem. The only problem was the dropping of the tins. The tins would sometimes hang once in awhile when the hopper was overloaded.

I explained that this problem could be prevented by loading the hopper half way, as the weight of the slides can cause the lower slides to stick together or become "embedded", when the hopper is fully loaded.

We then went to the 18" x 7/8" slides to show how much easier these ran with the multi-sheet calendar (thickness of .051") instead of the 3/4" slides, which are too narrow for the thickness of these calendars.

3. Center Support:

These were not being correctly used or in some cases were not being used at all. This caused the slides not to fall and to bow. Improper adjustment of the center supports can have the same result. I adjusted the center supports to support the center slides properly and showed them how to do this.

4. Double picking and wear on machines:

I went to the #3 machine with Martin and John to watch the 22" x 5/8" slide running. They said that these were giving them trouble. The tins would "pick double" sometimes, when the hoppers were overloaded, owing to wear on the pickers. I observed wear on the pickers on all the machines and on some other crucial parts. I mentioned that additional trouble could be expected with the ACF's in the future, owing to their age.

My recommendation is that the ACF's should be reconditioned or replaced with newer machines.

My recommendation is that the ACF's should be reconditioned or replaced with newer machines.

- Stuebing changes customer service tactics and offers to provide Norwood with a dimpled plastic eyelet slide.

Stuebing September 30, 2003
Letter to Norwood



Phone (513) 771-8028
Fax (513) 771-1072

10503 Chester Rd., Cincinnati, Ohio 45215-1206

September 30, 2003

Ms. Shelley K. Shoen, Buyer
Norwood Promotional Products, Inc.
1000 Highway 4 South
Sleepy Eye, MN 56085-1848

Dear Shelley,

As you know, the calendar business is firmly planted in traditional printing and timing methods. And while we are honored to be a longstanding part of that history, we are focused on the future as we look for new ideas and technology to enhance our product line.

We are proud to announce a modification to our standard calendar tin. We have been alerted to some problems with stacking and scratching. We have addressed these issues by adding a series of dimples.

We are in the process of obtaining a patent for this innovation. We have enclosed a letter from our attorney Keith R. Haupt explaining the legal aspects of this unique calendar slide.

Here at Stuebing it is our goal to provide our customers with the highest quality of product available. We will continue to keep you abreast of any and all efforts to that end.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jane E. Biddinger".

Jane E. Biddinger
Accounts Manager

Enclosure

We are proud to announce a modification to our standard calendar tin. We have been alerted to some problems with stacking and scratching. We have addressed these issues by adding a series of dimples.

Source: Norwood Public
Prehearing Brief at Exhibit 8.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

- For the first time, Stuebing provides Norwood with samples of slides with a cut out instead of a plastic eyelet.
- Stuebing characterizes these slides as being used by “third and fourth world countries.”

Stuebing October, 2003 Message to Norwood

A MESSAGE FROM:

FAX NO. (513) 771-0022
TELEPHONE (513) 771-8028

STUEBING

AUTOMATIC MACHINE CO.
10600 CHESTER RD., CINCINNATI, OH 45215-1206

ATTENTION: Norwood Promotional Products
Shelley Shoen

DATE: October, 2003

FROM: Allan Gavronsky

1 NUMBER OF PAGES
INCLUDING THIS ONE

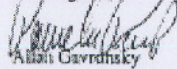
Shelley,

Please call me when you receive these samples. These type of slides have a cut out instead of a plastic eyelet and if you will notice that the cut out part weakens the slide dramatically which can allow breakage or kinking of the slide. When this slide is pinned on the calendar the bottom of the notch cut out will often show on the front of the calendar, whereas the plastic eyelet is completely hidden because there is no notch cut out. Also, the cut out part is extremely sharp and we have had many problems with people being severely cut, subjecting us to law suits.

These slides were not designed to be run in automatic machinery, as if there is any burr on the cut out notch, they will scratch and stick together. These slides are mainly used by third and fourth world countries.

If I can be of further assistance, please don't hesitate to call me.

Kind regards,


Allan Gavronsky

for:

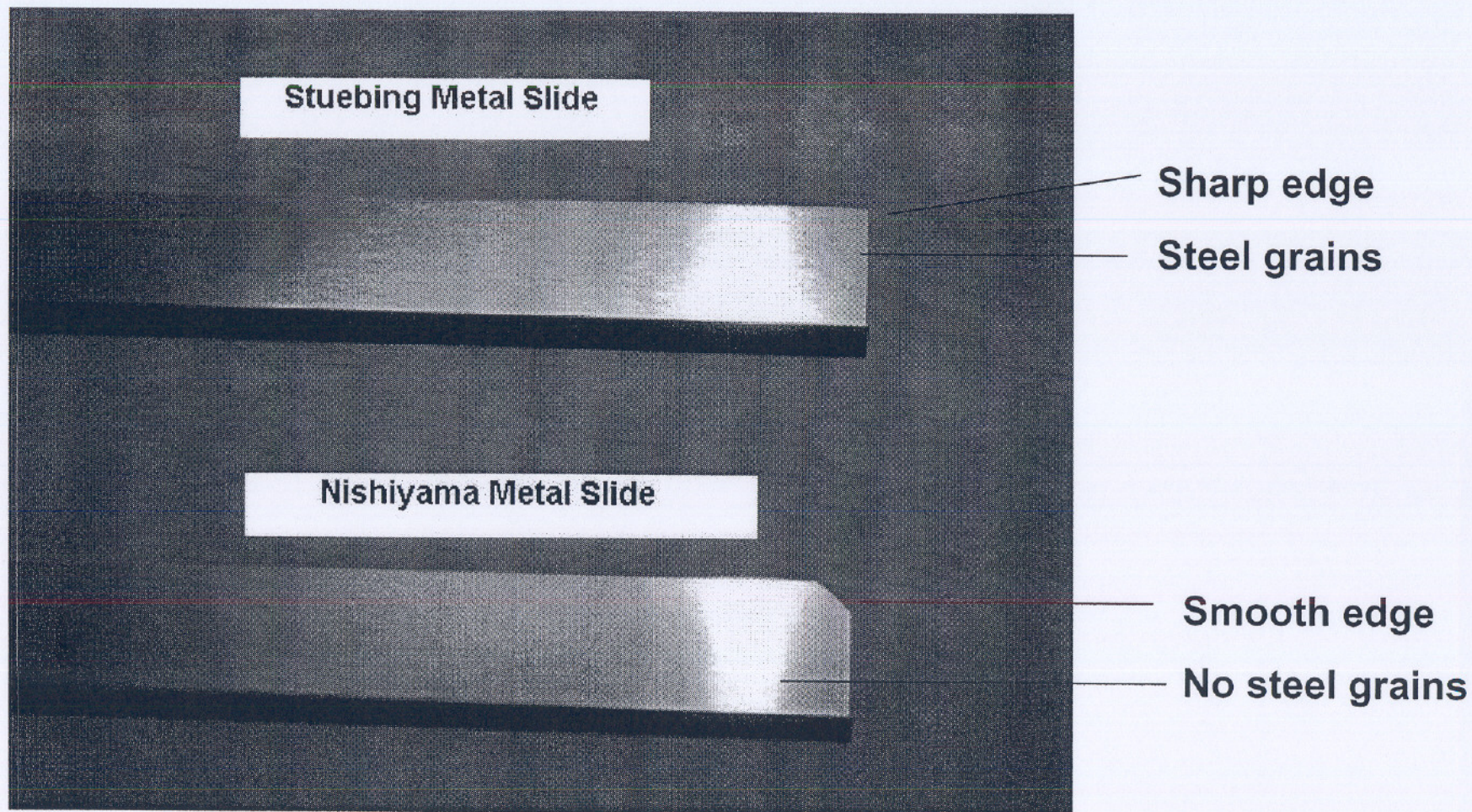
Source: Nishiyama Public
Prehearing Brief at Exhibit 3.

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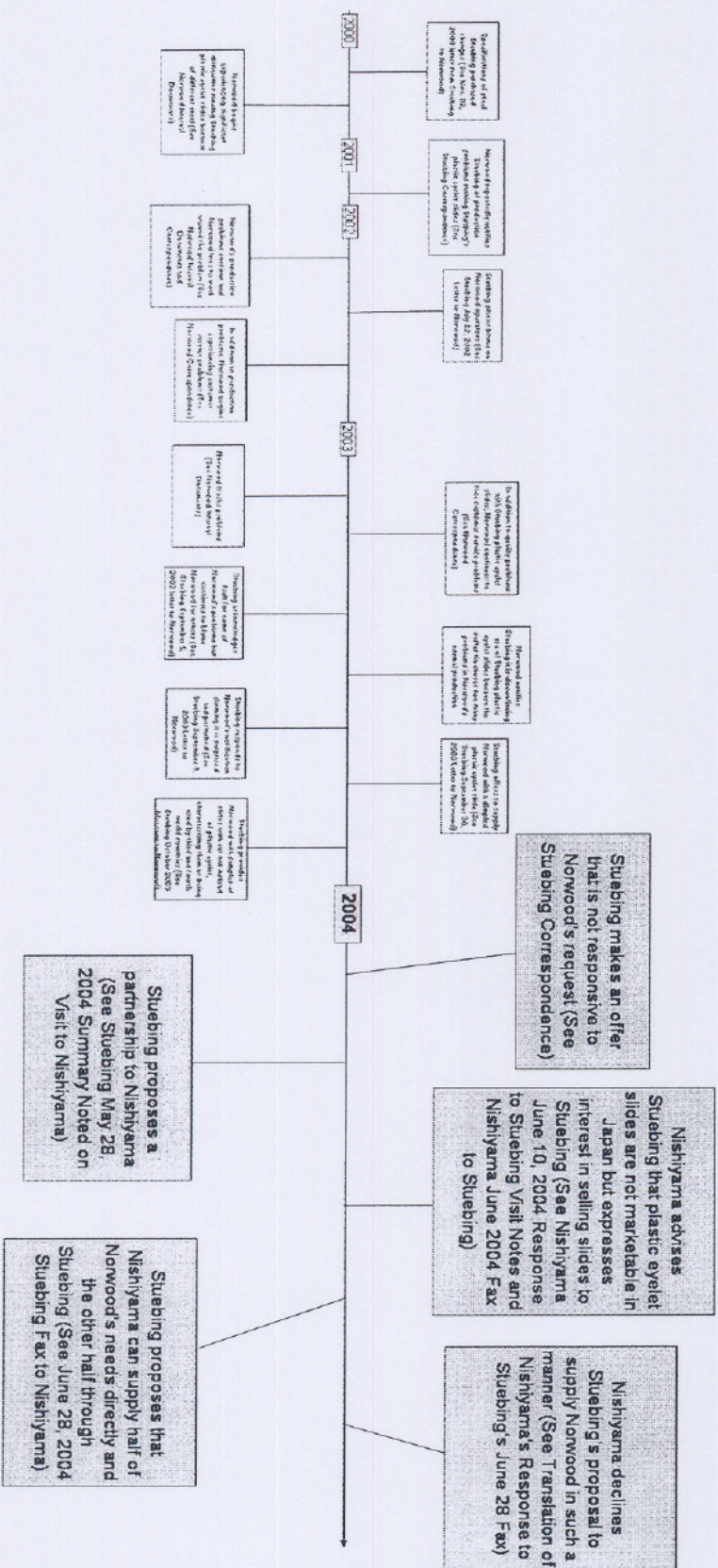
Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.



Source: Norwood Public
Prehearing Brief at Exhibit 21-
H

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

2004



Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

- Stuebing makes an offer that is not responsive to Norwood's request. See Exhibit 20 of Norwood's Confidential Prehearing Brief.

- Norwood acknowledges that the initial runs of the Stuebing “Japan-style” slide are working well, but expresses concern over the paint.

Norwood May 5, 2004 Email to Stuebing

07/22/2005 14:16 7711041

Page 1 of 1

Stuebing

From: "Shelley Shoen" <sshoen@norwood.com>
To: "Paul Perry (Stuebing)" <perry@stuebing.com>
Sent: Wednesday, May 06, 2004 12:17 PM
Subject: Tin Material

Pam-

As per our conversation, we are requesting that any calendar slide that is 24" and longer be produced with the material that was supplied in 2002 and 2003 in volume.

Also, we are requesting that the total slide height be no greater than 38".

Lastly, the 17" and 18" tin has acceptable runability and very few problems.

Regards,

Shelley Shoen
Norwood Publishing
1000 Highway 4 South
Sleepy Eye, MN 56083
507 754 8030
FAX 507 754 8306

Lastly, the 17" and 18" tin has acceptable runability and very few problems

7/21/2005

Source: Nishiyama Public
Prehearing Brief at Exhibit 15.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Norwood May 6, 2004 Email to Stuebing

Stuebing

From: "Shelley Sheen" <Ssheen@norwood.com>
To: "Pam Kump (E-mail)" <pkump@stuebing.com>
Sent: Thursday, May 06, 2004 9:10 AM
Subject: 17" Slide

Pam--

I was just on the operating floor and observed the tin in operation. The runability is the same as the Japanese product and is acceptable to the operators. They noted to me that the weight of the boxes is acceptable where the Japanese boxes were heavier than our expectations. They also commented that after the calendar is tinned with Stuebing tin vs. Japanese tin, the Stuebing calendars stack better.

The only negative comment is that when handling the tin, their hands get dirty and then rubs on the calendars when they pick them up. They feel it has to do with the paint that is applied on the slides. We are concerned that after the calendars are packaged into the box that they will rub on the next calendar and leave a black mark. We would appreciate it if you could check into that.

Again, thanks to everyone for all the efforts put forth. It is much appreciated.

Shelley Sheen
Norwood Publishing
1000 Highway 4 South
Sleepy Eye, MN 56083
507 794 8036
FAX 507 794 8366

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5/6/2004

Source: Nishiyama Public
Prehearing Brief at Exhibit 15.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing May 10, 2004 Email to Norwood

From: Stuebing [cramp@stuebing.com]
Sent: Monday, May 10, 2004 10:47 AM
To: Shelley Shoen
Subject: response to e-mail 5/5/04

Dear Shelley,

Thank so much for your E-mail of 05/06/04. It was gratifying to see that we are finally getting our act together and hopefully things will work out for the best for all of us.

I have contacted our material decorator and expressed concern about the film on the coating, we are also checking this out here.

Please let me know how things progress.

Kindest regards,

Patricia Ramey
Stuebing Automatic Machine Co.
10600 Chester Rd.
Cincinnati, Ohio 45215
513-771-8028 ext. 14
513-771-1072 fax

It was gratifying to see that we are finally getting our act together . . .

I have contacted our material decorator and expressed concern about the film on the coating, we are also checking this out here.

Source: Nishiyama Public
Prehearing Brief at Exhibit 15.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing May 28, 2004 Talking Points for Visit to Nishiyama

TRANSLATION

May 28, 2004

Discussion on Possibilities of Partnership between
Nishiyama Kinzoku Co., Ltd. and Stuebing Automatic Machine Company, Inc.

1. The purpose of this visit is to pursue the further possibilities of prospective partnership between Nishiyama Kinzoku and ourselves following the previous meeting on December 2003 in Cincinnati. As we discussed in the meeting, we both companies may benefit from our mutual partnership to increase our shares in the market as the world seems getting narrower in process of globalization.

While we have examined the possibilities of our partnership since the previous meeting, we developed some challenging and exciting innovations. This visit is to introduce you those innovations and to offer you first opportunity for mutual association to develop them.

At the previous meeting you told that your approach is to grow share. I pondered it and have reached conclusion that association of Nishiyama and Stuebing will actually increase each shares and expand our business into wider area in the world.

2. Our client in Minnesota began sourcing your slides and then we had a chance to look Japan-made slides which were come from binding machines and slide installation machines inside the factory when we visited it by invitation.
3. We checked it and found that the Japanese slides run more effectively in the binding process than the American ones which have plastic hangers on them.
4. On returning to our factory in Cincinnati we started improving our machines and introduced a new mold to produce the same slides as yours. As a result, we succeeded in supplying enough volumes of those slides to the client in Minnesota.
5. On the other hand, our domestic clients reported that the U.S.-made slides with plastic hangers were superior as finished products even though Japanese slides had more effective productivity in the binding process. Our individual research shows the Americans generally prefer slides with plastic hangers.
6. I will give you brief analysis of merits and demerits for both slides as follows.
7. Japanese slides - merits

The items below show reasons why Japanese slides are superior to the U.S. ones on the productivity.

- 7.1 Japanese slides are made of heavy material and have tough finish. They run from magazine into binding position smoothly without bending.

Our client in Minnesota began sourcing your slides and then we had a chance to look Japan-made slides which were come from binding machines and slide installation machines inside the factory when we visited it by our invitation.

We checked it and found that the Japanese slides run more effectively in the binding process than the American ones which have plastic hangers on them.

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On the other hand, our domestic clients reported that the U.S.-made slides with plastic hangers were superior as finished products even though Japanese slides had more effective productivity in the binding process. Our individual research shows the Americans generally prefer slides with plastic hangers.

The items below show reasons why Japanese slides are superior to the U.S. ones on the productivity.

Japanese slides are made of heavy material and have tough finish. They run from magazine into binding position smoothly without bending.

Source: Nishiyama Public
Prehearing Brief at Exhibit 2.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing May 28, 2004 Talking Points for Visit to Nishiyama

7.2 Japanese slides with wide width and round corner are installed more surely and easily detached from picker.

7.3 Japanese slides easily come into magazine of automatic binding machine. On the contrary, the U.S. slides get thicker with plastic hanger and metallic rivet which fixes hangers on slides, and this excess thickness makes slides unstable in the middle and can not be installed smoothly.

7.4 Therefore, Japanese slides without plastic hanger (and other attachments described above) are superior to the U.S. slides in respect of productivity by automatic binding machine. This is significant point for many calendar manufacturers like the client in Minnesota.

8. The U.S. slides - merits

8.1 Almost all users and clients in the U.S. prefer the long and flexible plastic hangers. Those hangers set calendars easily (especially for ladies with long nails).

8.2 The U.S. type of slide is tough and on the contrary center part of the Japanese slides is weaker because a hanger is part of a slide. For example, the Japanese slides tend to be buckled in its center if calendars are put roughly or strong wind blows them.

8.3 This is the important point to be mentioned. The Japanese slides with wide range need large amount of steel compared with the U.S. slides. The hanger is cut in corner part of slide and wide range is required. That means the Japanese slides waste material (high cost) and raise transportation cost for delivery. The increased delivery cost leads more serious problem.

9. Our attempts to Solution

Under the above circumstances, we attempted solution to take both merits from the Japanese and the U.S. slides which are high quality of the U.S. finished slides and Japanese productivity at production process.

10. Solution

10.1 Our idea is to produce hybrid type of slide which has the above merits like following illustration.

10.2 This is a simple type slide without a hanger (which installed bottom of calendar).

} Superior productivity

10.3 Wide angle.

10.4 This kind of slide has narrower range than the Japanese one and it costs less.

10.5 As shown below, hanger type which comes from coil on binding machine completes calendars with slides and plastic hangers.

Japanese slides with wide width and round corner are installed more surely and easily detached from picker.

Japanese slides easily come into magazine of automatic binding machine. On the contrary, the U.S. slides get thicker with plastic hanger and metallic rivet which fixes hangers on slides, and this excess thickness makes slides unstable in the middle and can not be installed smoothly.

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The Japanese slides with wide range need large amount of steel compared with the U.S. slides.

- Nishiyama expresses interest in selling slides to Stuebing.

Nishiyama June 10, 2004 Response to Stuebing Visit and Proposal to Market Slides with Plastic Eyelet in Japan

No.1

NISHIYAMA KINZOKU CO., LTD.
1-66 Nagatsugashi Higashi-Osaka City.
Osaka JAPAN
Tel 06-6788-8051 Fax 06-6788-2332

June 10 2004

Dear Mr. Blumberg
Stuebing Automatic Co

NEW METAL SLIDES IN YOUR PROPOSAL

Thank you for your proposal of new type metal slides.
We have had a quick and careful study on the new slides in Japanese market.

There is a long history of production of calendars bound by metal slides in Japanese market.
But the calendars with new way of binding system besides metal slides are getting more
Popular these days and the market of long lasting metal bound calendars is getting smaller recently.

In general opinion of Japanese companies concerning about calendar business, metal bound calendar
has two good points, one is the high productivity in high speed operation and the other is the low
production cost. But it has to give way to the other type calendars when it comes to the point of
looking and superior of different way of use.

It is quite difficult to understand for the most of the people concerning to calendar business in
Japan the reason why we should use the metal slides with hanger tape attached (your new slides)
though we have been using long time the cut out hanger slides which are cheap and enable us to
operate in high speed.

We like to show you the opinion of Japanese companies on your new slides.

- 1) New slides cost will be higher than the ordinary slides we use, though the width of
slides is narrower and material cost will be a little cheaper.
- 2) we will not able to increase our selling prices of the calendars with new slides and
calendar maker must pay for the increased production cost by themselves.
- 3) They suppose the system of inserting hanger tape into the small hole on the slide is not easy
to control, and there will be many trouble of operation in this process. And the production speed will be
slower than we expect.
- 4) There will be little merit to make transportation cost lower, though the slide weight will be lighter
than ordinary slides.
- 5) We can not suppose that we can increase our total sales amount with this new slides.

In totally speaking, they do not think that new slides will make calendars more attractive and
more popular in the market.
We regret to inform you that we could not get favorable response from the market at present.
But we like to reconsider it and make some efforts to get good results from it in future.

In general opinion of Japanese
companies concerning about
calendar business, metal bound
calendar has two good points, one is
the high productivity in high speed
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that new slides will make calendars
more attractive and more popular in
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that we could not get favorable
response from the market at present.

A PROPOSAL OF NISHIYAMA TO STUEBING

No.2

We thank you so much for the useful discussion held in Osaka recently, and like to consider the future's relationship between both of us.

The calendar business in Japan is changing much these days. The market of total Japanese calendar business is getting smaller, and new type calendars are increasing.

As a result, most of calendar factories are suffering from shrinking total market sales and increasing production cost.

But we can not increase the selling prices, because most of calendars are for promotional purpose and give-away items, and most of the customer's companies can not afford to accept the increase of calendar cost.

The binding machine of most of the calendar factories are quite old after long time operation, and are nearly worn out. They need to be renewed.

As a matter of fact, we have many inquiries for re-conditioned binding machine, but now cost it means most of the factories need to have new machines after long operation, but their financial situation can not afford them to get new machines.

We had information from you that you developed new type binding machine with cam-driven press system which is very similar to ours.

We are much interested in it and will appreciate so much to have information on the machine, such as price, specification and operating condition at earliest time.

CORPORATION BETWEEN US ON MEATL SLIDES SALES

As we explained you this time, we are producing slides in Japan though we have our factory in China. The reason is the high material cost of steel sheets in China, and they are importing it from Japan now. The quality of China-made steel sheets is not so good as the ones we use. Secondly, the above-mentioned material cost.

As for the man power cost, the automation system of our production lines are in quite high level, and man power cost is not high even compared with the ones in China.

We are thinking the role of our china factory is for production one for China market in future, and is not the one for Japanese or other market at present.

APPROACH TO NEW MARKET

We have inquiries from Asian countries a lot, but their buying prices are quite low than our supply costs and business is rather difficult to do with them now.

We think it is impossible to export metal slides to Asian countries from Japan or U.S.A. now.

So we are much interested in selling slides to EU and North American market. We will be very pleased to have good relationship with you and corporate in sales of not only slides but also binding machines in these area.

Nishiyama June 10, 2004 Response to Stuebing Visit and Proposal to Market Slides with Plastic Eyelet in Japan

A PROPOSAL OF NISHIYAMA TO STUEBING

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Nishiyama June 10, 2004 Response to Stuebing Visit and Proposal to Market Slides with Plastic Eyelet in Japan

No.3

Actually, we will produce metal slides for you and you will sell them in The States and EU in future under a good partnership. We will take responsibility for the production of any sizes and any quantity, and you will take responsibility for sales in these areas.

After production, we will keep the stock of slides at any place you like, in Japan or in the States. And you do not need to pay for the stock lot of slides. We will keep it on our account for any longer time. You will pay us only for the slides which you have already sold to your customers.

We believe both of us have long histories of metal slides production in each countries and have been doing great efforts to answer the customers requests. Japanese slide has been partly accepted in the States market since last year, but we do not believe our slides are getting popular and are accepted perfectly.

You indicated that the situation of our slides in your market is different though our slides are perfectly accepted in Japanese market. We quite agree with you and we think we need to pay more attention and do more efforts to answer the requests from the customers in the States.

We felt very bad atmosphere like a war at the time when we visited your office last year. After deep consideration, we believe we both of us have to seek out a good solution with favorable partnership for the fruitful result.

We think we need to cooperate and help each other. Both of us have strong points and weak points respectively. We believe we should do more efforts in each strong field, and in the weak field we should help each other to cover it. We are sure the best way is not to fight each other with big risks in the limited market, like a small pie, but to help each other for bigger pie.

At present the American slides are not so acceptable in Japanese market, and we believe it is reasonable to push sales of Japanese slides in the States or EU markets. We will take part of production of slides and you will take part of sales to get bigger market, and share profits each other.

FUTURE'S PLAN

We respect each other the markets and customers held by each other at present and keep the business in same way as it has been.

In case your customers will prefer to use the Japanese slides in the U.S. market and you will get Merits from that business, we will be so pleased to support you as far as possible and supply the slides in every size, and in any quantity including even very small quantity orders such as custom orders.

For approaching to the new market, we should discuss carefully and decide the way of sales and the place where we keep our stocks of slides. For instance we will have stock place in your company site or in our factory in Japan or in China, that will depend on the future markets.

Actually, we will produce metal slides for you and you will sell them in The States and EU in future under a good partnership. We will take responsibility of the production of any sizes and any quantity, and you will take responsibility for sales in these area.

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Nishiyama June 10, 2004 Response to Stuebing Visit and Proposal to Market Slides with Plastic Eyelet in Japan

Regarding binding machines, we believe both of us will be able to think it in same way under favorable cooperation. No. 4

In case we will cooperate to produce binding machines in same specification and same operation capacity, we are sure both of us will be able to get merits to lower the production costs and also to get more markets all over the world.

More over, it will be possible for the customers to produce calendars with both American type slides and Japanese type slides by one machine. It means the customers will be able to reduce their machine cost and will be able to select any type of slides with one machine following user's requires.

We think each of us need to have discussions on the many matters in details to build up good partnership for future's cooperation.

We really wish to be able to set up good relationship with you and to enjoy profitable results together.

With best regards,
Nishiyama Kinzoku Co., Ltd.
K. Nishiyama



More over, it will be possible for the customers to produce calendars with both American type slides and Japanese type slides by one machine.

- Stuebing responds to Nishiyama with an unusual proposal to supply Norwood.
- Stuebing did not know the price of Nishiyama's slides at the time of its proposal, meaning that this was not price-based defensive importing that the Commission sometimes sees.

Stuebing June 28, 2004 Fax to
Nishiyama

25001211100 170000 25: 1011001100 PUBLIC VERSION 1:10 8:11

Stuebing
AUTOMATIC MACHINE CO. INC.

SOUTH AFRICAN OFFICE:
Telephone: +27 11 493 8338
Fax: +27 11 493 8309
Corner Cross Street & Bonanza Road
Opifera, Johannesburg 2001
P.O. Box 94304, Soweto, 2015

TELEFAX MESSAGE

TO: NISHIYAMA KINZOKU CO. LTD.
ATT: MR. K. NISHIYAMA
FAX: 0661 8 8758 2338
DATE: 28 JUNE 2004

Dear Mr Nishiyama,

I thank you again for your fax of June 10, which I will now answer in detail.

1. New Patented Slides
Thank you for your comments which are noted.

2. Changing Calendar Business in Japan
2.1 We note your comments with interest.
2.2 Could you possibly counter 2 or 3 of the calendars bound in the new way to us? For convenience you could use either DHL, a/c no. 060480698 or UPS a/c no. 044309.
We will revert to you further about this in the near future.

3. The Binding Machine
3.1 Nishiyama Machine
We would like to sell the Nishiyama machines because of their good quality and robust construction. Unfortunately, as we have observed previously, they are too expensive for the American market.

3.2 New Stuebing Machine (Cam-driven)
3.3 Unfortunately, even at a price of about [] this is also very expensive for the U.S. market.

Source: Nishiyama Public
Prehearing Br. at Exhibit 4.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing June 28, 2004 Fax to Nishiyama

-2-

- 3.4 We have decided in principle that we will not be building any more of these machines.

We are currently looking for a way to offer a less expensive machine. Is there any possibility of securing re-conditioned machines from yourselves? If so, could you please give us an indication of prices.

4. Co-operation between us on Metal Slide sales for United States Market

- 4.1 We were very pleased to hear of your willingness to co-operate with us and we too would like to further develop a good relationship, and partnership with yourselves.

- 4.2 We also appreciate your offer to keep stock of slides in Japan or in the U.S.A., on the basis that we pay for these slides as they are sold to our customers. Most probably the best solution will be to warehouse some stock in Japan and some stock in the U.S.A.

- 4.3.1 In answer to the problem about the different types of slides used in Japan and the U.S.A., a possible solution may be for you to supply plain slides to us (like slides used at bottom of calendars), or slide with slot, to accept plastic hanger to be supplied with attaching unit on binding machine. Would this be possible?

- 4.3.2 We are developing the attaching unit currently. For those customers who accept or prefer the Japanese style of slide (broad slide with metal hangers and corners cut), naturally we would order these from you.

- 4.3.3 We think that it will be most practical for us to continue to manufacture:

1. For those customers who require the American type slide with plastic hanger, and
2. Rush rush orders and small orders which it will not be cost effective and timeous to ship from Japan, but that
3. We should look at the possibility of importing slides from you for the large American customers, for use on the automatic binding machines, who use standard sizes and where it will be practical to ship these by sea and hold some stock in the U.S.A. This group of customers, in any case, constitutes the largest segment of our U.S. slide business.
4. As you can imagine, such a change in the way we operate would result in significant changes to our operation, including retraining of machine operators, provision of adequate facilities to warehouse as well as changes in the structure and financial model of the company.

Co-operation between us on Metal Slide sales for United States Market

In answer to the problem about the different types of slides used in Japan and the U.S.A., a possible solution may be for you to supply plain slides to us (like slides used at bottom of calendars), or slide with slot, to accept plastic hanger to be supplied with attaching unit on binding machine.

For those customers who accept or prefer the Japanese style of slide (broad slide with metal hangers and corners cut), naturally we would order these from you.

We think that it will be most practical for us to continue to manufacture:

-For those customers who require the American type slide with plastic hanger, and

-We should look at the possibility of importing slides from you for the large American customers, for use on the automatic binding machines, who use standard sizes and where it will be practical to ship these by sea and hold some stock in the U.S.A. This group of customers, in any case, constitutes the largest segment of our U.S. slide business.

Source: Nishiyama Public Prehearing Br. at Exhibit 4.

Prepared by White & Case LLP on behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing June 28, 2004 Fax to Nishiyama

- I have requested our accountants in Cincinnati to work with us to develop a new financial model, which will be financially viable. I will travel to Cincinnati towards the end of next month to work on this project further, in July/August.
8. In order to help us to work out this new model, could you please assist us with the following information:
- 4.4 Pricing
- Can you please indicate to us the very best price levels at which you would be prepared to supply us and
- 4.5 Please also indicate to us your idea of the percentage mark-up you feel that we can add to the landed prices from Japan, in return for marketing, warehousing, distributing and servicing the customers' machines.
- 4.6 We would also like some assurance that the prices at these levels will be sustainable i.e. that we can expect that these price levels will remain as they are for the next few years, subject of course to changes in input costs such as raw material, labour etc.
- 4.7 Norwood
- What is your idea about how we deal with Norwood in the future, under such an arrangement? It is my understanding that Norwood would like to have 2 suppliers.
- Would it be possible, for example, for Nishiyama to supply 50% of Norwood's requirements directly to them, and the other 50% to us, to warehouse and distribute to them? If so, what are your suggestions as to:
- 4.7.1 The pricing for the 50% that we supply to Norwood, which would come to us from you, and
- 4.7.2 Will there be any "merits" (commission) on that portion that you supply directly to them?
- Our rationale for receiving a commission on the slides you supply directly to Norwood would be:
- We will be giving up this source of income,
 - In consideration for warehousing a buffer stock for Norwood and
 - Servicing their machines, as well as the other benefits that would flow to you from this arrangement.

Can you please indicate to us the very best levels at which you would be prepared to supply us

Norwood

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Would it be possible, for example, for Nishiyama to supply 50% of Norwood's requirements directly to them, and the other 50% to us, to warehouse and distribute to them? If so, what are your suggestions as to:

The pricing for the 50% that we supply to Norwood, which would come to us from you, and

Will there be any "merits" (commission) on that portion that you supply directly to them?

Our rationale for receiving a commission on the slides you supply directly to Norwood would be:

- We will be giving up this source of income.
- In consideration for warehousing a buffer stock for Norwood and
- Servicing their machines, as well as the other benefits that would flow to you from this arrangement.

Source: Nishiyama Public Prehearing Br. at Exhibit 4.

Prepared by White & Case LLP on behalf of Nishiyama Kinzoku Ltd. Co.

Stuebing June 28, 2004 Fax to
Nishiyama

Assuming a positive response to this question, what percentage do you have in mind for "merits"/commission you would pay to us on the slides you would supply directly to Norwood?

5. Future Plan

5.1 U.S.A.

Your suggestion of respecting each others markets and customers held by each other at present is a sensible one, and I agree that we should follow this principle, provided that there is appropriate consideration for us in respect of Norwood.

5.2 E.U. Market

I believe that we should try and work out a viable solution, along the lines suggested above, for the American market first, and that once this is running successfully we can tackle the European market.

In conclusion, there is much work to be done to achieve a cooperative agreement that is favourable to both parties. There will no doubt be many questions still to be answered. We do however appreciate your sentiments and your offer and we too would like to work towards setting up a good relationship, which is sustainable, and profitable for all of us.

We look forward to hearing further from you.

Best regards



Murray Blumberg

Assuming a positive response to this question, what percentage do you have in mind for "merits"/commission you would pay to us on the slides you would supply directly to Norwood?

Source: Nishiyama Public
Prehearing Br. at Exhibit 4.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

- Nishiyama politely, but firmly, rejects Stuebing's proposal with respect to supplying Norwood.

Translation of Nishiyama's Response to Stuebing's June 28, 2004 Fax to Nishiyama

[ENGLISH TRANSLATION OF NISHIYAMA'S REPLY
TO STUEBING'S JUNE 25, 2004 FAX MESSAGE]

Re: The Cooperative Relationship

Cooperation of Metal Slide Sales

We fully understood the continued production and sales of U.S. metal slides as proposed by your company, considering the situations in the U.S. market. It is our basic position on the plan to sell our metal slides through you that we provide our metal slides at the best price to you, and entrust you to find customers. We also understood that this cooperation scheme, however, would not be strengthened without clarifying the issue of Norwood, which is pending. Thus, as the next step, we would like to know the following information on your sales conditions:

- 1) Annual metal slide production volume of your company;
- 2) Projection of sales of your metal slides (U.S. made, actual);
- 3) Circumstance of your production division in the future; and
- 4) Types of metal slides (size, and color) that your company sold and will sell.

We are considering the scheme of the cooperation with your company. Your company also would be concerned with various factors, such as: how to deal with the production facility of your company after your starting sales of our Japanese metal slides; whether or not you will be able to purchase these metal slides at a stable price; how to take counter-measures when ocean transportation has troubles; how to set up the inventory policy. We would like to build up the system, which allow your company to concentrate on sales, by solving these issues one-by-one. In connection with the stable price issue, raw material price has been increasing in Japan as well. The steel material price increases on the worldwide basis. We would not be able to build up the stable supply system without dealing with this issue. We raised the above questions to understand the overall volumes to allow us to complete the production system for the U.S. and European markets, and to satisfy your desired stable price and settlements of used slides by size. Rather than the volume of metal slides in the United States, we would like to know the total volume that your company intends to sell. We are also considering that we will be able to reduce the burden of your company through the production of slides for next few years in advance and inventory control in Japan and the factory in China, if we understand the total picture of production shift to Japan-trade.

Norwood

We do not know whether Norwood would like to purchase from two companies. To the extreme, it is possible that Norwood will choose to purchase either 100% from us or 100% from you. The basic Japanese business style (our company's style) is that the customer decides the purchase issues. It is not something that either the vendor or we can manipulate. Thus, it is up to Norwood, even if you and we agree to divide Norwood sales into 50% each. There is nothing else than that we should make the best efforts in order for Norwood to

It is our basic position on the plan to sell our metal slides through you that we provide our metal slides at the best price to you, and entrust you to find customers.

Norwood We do not know whether Norwood would like to purchase from two companies. To the extreme, it is possible that Norwood will choose to purchase either 100% from us or 100% from you. The basic Japanese business style (our company's style) is that the customer decides the purchase issues. It is not something that either the vendor or we can manipulate. Thus, it is up to Norwood, even if you and we agree to divide Norwood sales into 50% each. There is nothing else than that we should make the best efforts in order for Norwood to choose us.

Source: Nishiyama Public
Prehearing Br. at Exhibit 4.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Translation of Nishiyama's Response to Stuebing's June 28, 2004 Fax to Nishiyama

choose us. It would be easy if Norwood would purchase our metal slides from you who procured from us, and at the same time if Norwood would be willing to purchase our metal slides from us directly. There would be reasons for Norwood to maintain dual sources, such as advantages of our company in terms of product values and productibility, and advantages of your companies in the immediate delivery, separate delivery, and the necessity to purchase U.S. slides. Therefore, our company would like to base our decisions on how we transact with you, rather how we transact with Norwood. As such, we would like to confirm the potential increase of our sales to U.S. and European markets. The issues of commission, which you refer to, would then come into our consideration.

As you argue, U.S. metal slides would not disappear. The volume of Japanese metal slides, therefore, would significantly change, depending on your introduction of our slides to calendar producers. We appreciate and respect your sales power and trustworthiness. Thus, we proposed that we entrust sales on you. We think that we would make efforts and cooperate with your company to enlarge your profit after your switching production & sales to purchase & sales (except for certain U.S. metal slides).

We will make efforts to be a manufacturing company, which you can fully rely on.

There would be reasons for Norwood to maintain dual sources, such as advantages of our company in terms of product values and productibility, and advantages of your companies in the immediate delivery, separate delivery, and the necessity to purchase U.S. slides. Therefore, our company would like to base our decisions on how we transact with you, rather how we transact with Norwood.

Source: Nishiyama Public
Prehearing Br. at Exhibit 4.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

- Norwood's problems with Stuebing Japan-style slides continue well after Stuebing began supplying them and well before Stuebing filed the antidumping petition.

Stuebing October 15, 2004 Email to Norwood

From: Stuebing [mailto:stuebing@stuebing.com]
Sent: Friday, October 15, 2004 12:22 PM
To: Shelley Shoen
Subject: REPLY TO PHONE CALL

Hi Shelley,

Allan just phoned - his flight has been re-routed and he will be traveling all day, he won't arrive at his destination until late tonight - he could not talk - had to run to catch next flight. I've tried to contact Bill Piernose (he's on vacation) but can't reach him. Worst case scenario is that Bill will be in on Monday and he can call you then. Can you please send some samples of the slides that are sticking so that Bill can see them on Monday?

If there's anything else I can do just let me know.

Kind regards,

Pamela Ravep
Stuebing Automatic Machine Co.

Can you please send some samples of the slides that are sticking so that Bill can see them on Monday?

Source: Nishiyama Public
Prehearing Brief at Exhibit 15.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.

Norwood March 8, 2005 Email to Stuebing

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PAGE 04
Page 1 of 1

Stuebing

From: "Shelley Shoen" <Sshoen@norwood.com>
To: "Pete Flann (E-mail)" <pflann@stuebing.com>
Sent: Tuesday, March 08, 2005 5:28 PM
Subject: Tin

Peer-

A statement per your request regarding the runability of.

We do not meet the rates that are expected of us all the time. We do experience times when things go well and other times when we struggle with the slides. I would rate the product as fair, but other times it is acceptable when we are meeting our goals.

If you have any questions, please let me know.

Shelley Shoen
Norwood Publishing
1000 Highway 4 South
Sleepy Run, MN 55065
507 784 6335
FAX 507 784 6305

Per our conversation, we will
A statement per your request regarding the runability of tin.

We do not meet the rates that are expected of us all the time. We do experience times when things go well and other times when we struggle with the slides. I would rate the product as fair, but other times it is acceptable when we are meeting our goals.

7/21/2005

Source: Nishiyama Public
Prehearing Brief at Exhibit 15.

Source: Nishiyama Public
Prehearing Brief at Exhibit 15.

Prepared by White & Case LLP on
behalf of Nishiyama Kinzoku Ltd. Co.